

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FERNANDA GARBER, MARC LERNER,  
DEREK RASMUSSEN and ROBERT  
SILVER, representing themselves and all  
others similarly situated,

Plaintiffs,

v.

OFFICE OF THE COMMISSIONER OF  
BASEBALL, MAJOR LEAGUE  
BASEBALL ENTERPRISES INC., MLB  
ADVANCED MEDIA L.P., DIRECTV  
LLC, DIRECTV SPORTS NETWORKS  
LLC, ROOT SPORTS PITTSBURGH,  
ROOT SPORTS ROCKY MOUNTAIN,  
ROOT SPORTS NORTHWEST,  
COMCAST CORP., COMCAST  
SPORTSNET PHILLY, L.P., COMCAST  
SPORTSNET BAY AREA, L.P.,  
COMCAST SPORTSNET CHICAGO,  
L.P., YANKEES ENTERTAINMENT  
AND SPORTS NETWORKS, LLC,  
ATHLETICS INVESTMENT GROUP,  
LLC, THE BASEBALL CLUB OF  
SEATTLE, L.P., CHICAGO NATIONAL  
LEAGUE BALL CLUB, LLC, CHICAGO  
WHITE SOX, LTD., COLORADO  
ROCKIES BASEBALL CLUB, LTD.,  
NEW YORK YANKEES PARTNERSHIP,  
THE PHILLIES, L.P., PITTSBURGH  
BASEBALL, INC., AND SAN  
FRANCISCO BASEBALL ASSOCIATES,  
L.P.,

Defendants.

**12 CIV 3704 (SAS)**  
[rel. 12-cv-1817 (SAS)]

ECF CASE

ELECTRONICLY FILED

**SECOND SUPPLEMENTAL CORPORATE  
DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1, and S.D.N.Y Local Civil Rule 7.1.1,  
the defendants DIRECTV, LLC, DIRECTV Sports Networks, LLC, DIRECTV Sports Net  
Rocky Mountain, LLC (a/k/a ROOT Sports Rocky Mountain), DIRECTV Sports Net Northwest,

LLC (a/k/a ROOT Sports Northwest) and DIRECTV Sports Net Pittsburgh, LLC (a/k/a ROOT Sports Pittsburgh) (collectively “DIRECTV Defendants”) provide the following supplemental disclosure statement to enable the Court to evaluate possible disqualification or recusal. The undersigned counsel of record for DIRECTV Defendants state that the following listed entities may have a pecuniary interest in the outcome of this case:

A. DIRECTV Holdings LLC, which is the direct parent company and 100% owner of defendant DIRECTV, LLC.

B. The DIRECTV Group, Inc., which is the direct parent company and 100% owner of DIRECTV Holdings LLC.

C. Greenlady Corp., which controls a 57% interest in The DIRECTV Group, Inc.

D. DTV Entertainment, Inc., which is the direct parent company and 100% owner of Greenlady Corp.

E. Defendant DIRECTV Sports Networks, LLC, a Delaware limited liability company, is a wholly-owned, direct subsidiary of Greenlady Corp. and is not publicly traded.

F. Defendants DIRECTV Sports Net Pittsburgh, LLC (a/k/a ROOT Sports Pittsburgh) and DIRECTV Sports Net Rocky Mountain, LLC (a/k/a ROOT Sports Rocky Mountain), are each Delaware limited liability companies. Each is a wholly-owned, direct subsidiary of DIRECTV Sports Networks, LLC.

G. Defendant DIRECTV Sports Net Northwest, LLC (a/k/a ROOT Sports Northwest), a Delaware limited liability company, is a wholly-owned subsidiary of NW Sports Net LLC, a Delaware limited liability company, which is not publicly traded. DIRECTV Sports

Holdings Northwest, LLC owns 29% of NW Sports Net, LLC and is a wholly-owned subsidiary of DIRECTV Sports Networks, LLC. More than 10% of DIRECTV Sports Net Northwest, LLC is indirectly owned by Nintendo Co. Ltd., a Japanese company that is publicly traded on the Tokyo stock exchange.

F. DIRECTV Group Holdings, LLC, which is the direct parent company and 100% owner of DTV Entertainment, Inc., and which controls a 43% interest in The DIRECTV Group, Inc.

G. AT&T Inc., which is publicly traded and is the ultimate parent company of DIRECTV Group Holdings.

DATED: August 7, 2015

**ALSTON & BIRD LLP**

By: /s/ Andrew E. Paris

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